

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In re:	)	
	)	
Amendment of Section 73.606(b),	)	Federal Communications Commission
Table of Allotments, Television Broadcast	)	Office of Secretary
Stations; and Section 73.622(b),	)	MB Dkt. No. 04-265
Table of Allotments, Digital Television	)	RM-10439
Broadcast Stations	)	
(Seattle, Washington)	)	

To: The Secretary, FCC  
Attn: Chief, Video Division, Media Bureau

**COMMENTS IN SUPPORT OF RULEMAKING**

KCTS Television ("KCTS"), by its attorneys and pursuant to the Commission's Rules, comments on the above-referenced rulemaking proceeding to amend Sections 73.606(b) and 73.622(b) of the Rules. The rulemaking proposes to amend the Commission's Rules by substituting DTV channel \*53 for NTSC channel \*62 at Seattle, Washington.

KCTS initiated this proceeding and reaffirms its interest in applying for DTV channel \*53 at Seattle, if allotted. If authorized to do so, KCTS will promptly build this station on the requested channel. KCTS hereby incorporates by reference the showings made in its *Petition for Rulemaking* in this proceeding, as filed with the FCC on March 8, 2002, and amended February 27, 2004 and July 16, 2004.

For these reasons and those expressed in the prior *Petition*, KCTS supports the rulemaking proceeding to amend Sections 73.606(b) and 73.622(b) of the Commission's Rules to substitute DTV channel \*53 for NTSC channel \*62 at Seattle, Washington.

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Respectfully submitted,

KCTS TELEVISION

By: Barry Persh  
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Its Attorneys

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September 1, 2004

**Declaration Under Penalty Of Perjury**

I, Monica Reiser, hereby declare under penalty of perjury that the foregoing statements set forth in these Comments supporting the amendment to Sections 73.606(b) and 73.622(b) of the Commission's Rules are true and correct to the best of my knowledge and belief.

By: Monica Reiser

Title: General Counsel  
Asst. Secretary

Date: 8-26-04